

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT,

Defendant.

Civil Action No. 07-3378 (GEL)

DECLARATION OF MATTHEW COLANGELO

Matthew Colangelo, pursuant to penalty of perjury under 28 U.S.C. § 1746, does hereby state the following:

I am an attorney with the NAACP Legal Defense & Educational Fund, Inc. ("LDF"), and I am counsel for the Plaintiff in the above-captioned matter. I submit this Declaration in support of Plaintiff's motion for partial summary judgment. Attached to this Declaration are true and correct copies of the following numbered exhibits:

1. Newspaper Article: Shaila Dewan, *Patchwork City: Road to New Life After Katrina is Closed to Many*, N.Y. Times, July 12, 2007, at A1.
2. LDF FOIA Request of 3/19/07.
3. Letter from O'Connor to Colangelo of 3/22/07.
4. Letter from Hall to Colangelo of 4/30/07.
5. Letter from Clark to Eshkenazi of 5/21/07.
6. Letter from Johnson to Clark of 6/20/07.
7. Letter from Hall to Clark of 6/29/07.

8. First Excerpt from Audit Records: HUD OIG Review and Concerns of Louisiana Action Plan Amendment, dated 4/27/06 (bates-stamped OIG-RR-00055 to -00060).
9. Second Excerpt from Audit Records: HUD OIG Review and Concerns of Mississippi Partial Action Plan, dated 4/27/06 (bates-stamped OIG-RR-00061 to -00066).
10. First Excerpt from Investigative Records: Memorandum from Amaker to Duncan of 2/7/07 (bates-stamped OIG-RR-00155).
11. Second Excerpt from Investigative Records: E-Mail of 1/31/07, subject "Re: Small Business Recovery Loans" (bates-stamped OIG-RR-00173 to -00174).

Dated: July 26, 2007
New York, NY


MATTHEW COLANGELO